

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DISTRICT**

ADELA BAI, on behalf of itself and all others  
similarly situated,

Plaintiff,

v.

TCP INTERNATIONAL HOLDINGS LTD.,  
KAREL ROBERT DEN DAAS, ELLIS YAN, and  
BRIAN CATLETT,

Defendants.

Case No. 1: 16-cv-00102

Judge Donald C. Nugent

**NOTICE OF LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT AND PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving the Settlement, Directing the Issuance of Notice, and Scheduling a Final Approval Hearing dated July 28, 2017, and upon (i) the Joint Declaration of Leigh Handelman Smollar and Adam M. Apton in Support of: (A) Motion for An Order Granting Final Approval of Class Action Settlement and Directing Dissemination of Notice to the Class and (B) Motion in Support of Attorneys' Fees, Reimbursement of Expenses and Reimbursement Award to Lead Plaintiffs; (ii) the Declarations of Leigh Handelman Smollar, Adam M. Apton, Sarah Evans, Michael Rivkind, Adela Bai, and Roland Willis; (iii) the Memorandum of Law in Support of Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; and (iii) all other papers and proceedings herein, Co-

Lead Counsel and Lead Plaintiffs, on behalf of themselves and the Settlement Class, will and hereby do move this Court, before the Honorable Donald C. Nugent, on February 1, 2018 at 10:00 a.m., at the United States District Court for the Northern District of Ohio, United States Courthouse, Carl B. Stokes United States Court House, 801 West Superior Avenue, Courtroom 15A, Cleveland, Ohio, or at such other location and time as set by the Court, for entry of a Judgment approving the Settlement as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable.

Dated: December 22, 2017

Respectfully submitted,

s/ Adam M. Apton

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*and Co-Lead Counsel for the Class*